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Request for Vaughn index in Riskin v Fashion District

Abenicio Cisneros <acisneros@capublicrecordslaw.com>

Sun, Sep 23, 2018 at 5:37 PM

To: Carol Humiston <chumiston@bglawyers.com>

Carol,

Thank you for sending an electronic copy of the BID's Answer. Please let me know whether you are amenable to electronic service moving forward.

Additionally, my client requires a list of withheld and redacted documents in order to properly litigate this matter. Such a list is commonly referred to as a "*Vaughn* index" in FOIA litigation. State courts have ordered the creation of such a list in CPRA matters. See, e.g., *State Bd. Of Equalization v. Superior Court* (1992) 10 Cal.App.4th 1177, 1993.

Let me know if your client is amenable to providing a list of withheld and redacted documents which conforms with the requirements of a *Vaughn* index without a court order. If your client is not amenable, let me know when we can meet and confer in advance of a motion for the list to be heard at the same time as the Trial Setting Conference.

Additionally, let me know if your client is amenable to resolving this matter via settlement. If so, we can setup a call with my co-counsel to discuss.

Let me know if you have any other questions for me at this time. Thank you.

Best,
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